

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
JEANNETTE FULLER HAUSLER, et al., :

Petitioner, :

-against- :

JPMORGAN CHASE BANK, N.A., et al., :

Garnishee-Respondents. :

09 Civ. 10289 (VM)
ECF Case

----- X
JPMORGAN CHASE BANK, N.A., et al., :

Garnishee-Respondents and
Third-Party Petitioners :

Related to JPM Chase/Citibank
Turnover Proceeding

In Respect of a Judgment
Entered in the State of Florida,
Case No. 02-12475-CA-09

-against- :

BANCO FINANCIERO INTERNACIONAL
S.A., et al., :

Adverse Claimants-
Respondents. :

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 3/22/11
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MOTION TO ADMIT COUNSEL PRO HAC VICE

PLEASE TAKE NOTICE that Adverse Claimant-Respondent Estudios Mercados y Suministros S.L. and named (but not yet served) Adverse Claimant-Respondent Philips Mexicana S.A. de C. V. move this Court for an order, pursuant to Local Civil Rule 1.3(c) of the Rules of the United States District Court for the Southern District of New York, admitting James

D. Pagliaro, Esquire *pro hac vice* to the Bar of this Court for the purpose of appearing and participating in the above-captioned action.

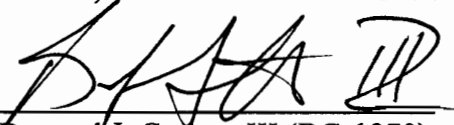
Applicant's Name: James D. Pagliaro, Esquire
Firm Name: Morgan, Lewis & Bockius LLP
Address: 1701 Market Street
City/State/Zip: Philadelphia, PA 19103
Phone Number: (215) 963-5000
Fax Number: (215) 963-5001
Email Address: jpagliaro@morganlewis.com

Mr. Pagliaro is a member in good standing of the bar of the Commonwealth of Pennsylvania. There are no pending disciplinary proceedings against Mr. Pagliaro in any State or Federal court.

In support of this motion, adverse claimant-respondent Estudios Mercados y Suministros S.L. and named (but not yet served) adverse claimant-respondent Philips Mexicana S.A. de C.V. submit herewith the affidavit of Bernard J. Garbutt III, sworn to on March 17, 2011.

Dated: New York, New York
March 17, 2011

MORGAN, LEWIS & BOCKIUS LLP

By: 
Bernard J. Garbutt III (BG-1970)
101 Park Avenue
New York, New York 10178-0060
Tel: 212.309.6000
Fax: 212.309.6001

*Attorneys for Adverse Claimant Respondent
Estudios Mercados y Suministros S.L. and
Named (but not yet served) Adverse Claimant -
Respondent Philips Mexicana S.A. de C.V.*

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S.A., et al.,	:	
	:	
Adverse Claimants-	:	
Respondents.	:	

AFFIDAVIT OF BERNARD J. GARBUTT III
IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

I, BERNARD J. GARBUTT III, an attorney admitted to practice law in the United States District Court for the Southern District of New York, being duly sworn, hereby deposes and says the following:

1. I am a partner with the law firm of Morgan, Lewis & Bockius LLP ("Morgan Lewis"), counsel for adverse claimant-respondent Estudios Mercados y Suministros S.L. and named (but

not yet served) adverse-claimant respondent Philips Mexicana S.A. de C.V. in the above-captioned action. I submit this affidavit in support of the motion to admit James D. Pagliaro, Esquire as counsel *pro hac vice* to represent adverse claimants-respondents Estudios Mercados y Suministros S.L. and named (but not yet served) adverse claimant-respondent Philips Mexicana S.A. de C.V. in this matter.

2. I am a member in good standing of the bar of the State of New York, and I was admitted to practice law in 1991. I am also admitted to the bar of the United States District Court for the Southern District of New York, and I am in good standing with this Court.

3 Mr. Pagliaro is a colleague of mine and a partner in the Philadelphia, Pennsylvania office of Morgan, Lewis & Bockius LLP.


4. Mr. Pagliaro has been a member of the bar of the Commonwealth of Pennsylvania since 1976, and is a member in good standing of that bar. Mr. Pagliaro's certificate of good standing is attached hereto as Exhibit "A."

5. I know Mr. Pagliaro to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

6. Accordingly, I am pleased to move the admission of James D. Pagliaro, Esquire *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of James D. Pagliaro, Esquire *pro hac vice*, which is attached hereto as Exhibit "B."

WHEREFORE it is respectfully requested that the motion to admit James D. Pagliaro, Esquire *pro hac vice*, to represent adverse claimant respondent Estudios Mercados y Suministros S.L. and named (but not yet served) adverse claimant-respondent Philips Mexicana S.A. de C.V. in the above-captioned matter, be granted.


Bernard J. Garbutt III

Sworn to before me this 18th day
of March 2011


Notary Public



EXHIBIT A



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

James D. Pagliaro, Esq.

DATE OF ADMISSION

November 1, 1976

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: March 10, 2011

A handwritten signature in cursive script, reading "Patricia A. Johnson".

Patricia A. Johnson
Chief Clerk

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BANCO FINANCIERO INTERNACIONAL	:	
S.A., et al.,	:	
Adverse Claimants-	:	
Respondents.	:	

ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

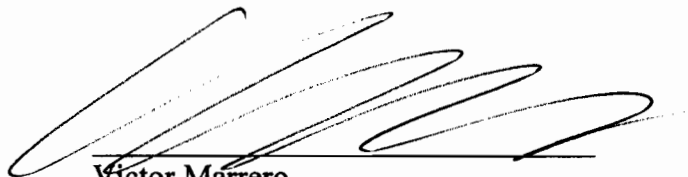
Upon the motion of adverse claimant respondent Estudios Mercados y Suministros S.L. and named (but not yet served) adverse claimant-respondent Philips Mexicana S.A. de C.V., and the affidavit of Bernard J. Garbutt III, sworn to on March , 2011, in support thereof:

IT IS HEREBY ORDERED that:

Applicant's Name: James D. Pagliaro, Esquire
Firm Name: Morgan, Lewis & Bockius LLP
Address: 1701 Market Street
City/State/Zip: Philadelphia, PA 19103
Phone Number: (215) 963-5000
Fax Number: (215) 963-5001
Email Address: jpagliaro@morganlewis.com

is admitted to practice *pro hac vice* as counsel for adverse-claimant respondent Estudios Mercados y Suministros S.L. and named (but not yet served) adverse-claimant respondent Philips Mexicana S.A. de C.V. in the above-captioned action in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. Counsel shall immediately apply for an Electronic Case Filing (ECF) system password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: New York, New York
March 24, 2011

A handwritten signature in black ink, appearing to read 'Victor Marrero', written over a horizontal line.

Victor Marrero
United States District Judge

CERTIFICATE OF SERVICE

I, Ramin Afshar-Mohajer, hereby certify that on March 18, 2011, I served a true and correct copy of the foregoing Motion to Admit Counsel Pro Hac Vice and Affidavit of Bernard J. Garbutt III in Support of same upon the following via U.S. Mail and electronic mail.

James L. Kerr
DAVIS POLK & WARDELL LLP
450 Lexington Avenue
New York, NY 10017

Attorneys for Garnishee-Respondents and Joint Third Party Petitioners JP Morgan Chase Bank, N.A., Citibank, N.A., USB AG, The Royal Bank of Scotland N.V. (formerly known as ABN AMRO Bank N.V.) and Bank of America, National Association

James W. Perkins
GREENBERG TRAURIG, LLP
200 Park Avenue, 38th Floor
New York, NY 10166

Attorneys for Petitioner and Adverse Claimant-Respondent Jeannette Fuller Hausler, et al.



Ramin Afshar-Mohajer